

## Appendix G: Explanation of Minimum Requirement and Minimum Tool Analysis

Wilderness managers often speak of “minimum required” or “minimum tool”. The terms are shorthand for the provisions found in section 4(c) of the Wilderness Act.

Section 4 (c) of the Act prohibits certain activities in wilderness by the public and, at the same time, allows the agencies to engage in those activities in some situations. Section 4 (c) states:

*“... except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.”*

In the above language, Congress acknowledged that even though certain activities are prohibited, there are times when exceptions to these prohibitions will need to be made for administration of the area. However, from the regulations, special orders, and internal agency policy, it is clear that the wilderness management agencies should not view the language in Section 4 (c) as blanket approval to conduct projects or allow activities without an analysis of (1) whether the project or activity is necessary to meet the minimum requirements for the administration of the area, and (2) which tool or method should be used to complete the project that results in the least impact to the physical resource or wilderness values.

Agency employees entrusted with management of wilderness should set the highest standard possible when reviewing management practices in wilderness. Wilderness is intended to be managed differently from other public lands and this difference needs to be demonstrated to the public.

The minimum requirement analysis is used to determine what is the least impacting way of administering the wilderness. The wilderness manager may authorize any of the generally prohibited activities or uses listed in Sec. 4(c) of the Wilderness Act if they are determined to be the minimum necessary to do the job and meet wilderness management objectives.

When conducting the actual minimum requirement analysis wilderness managers generally follow these steps:

1. Complete a minimum requirement analysis, for all proposed projects or activities. This step should not be used to justify use of motorized equipment or mechanical transport, but rather, to scrutinize the project or activity and make the best decision for wilderness in the long term. To determine if the proposal truly is required for the administration of the wilderness area, managers need to answer the following questions:
  - a. Is there an emergency?
  - b. Does the project conflict with stated wilderness goals, objectives and desired future conditions of applicable legislation, policy, and management plans?
  - c. Are there any less intrusive actions that should be tried first?
  - d. Can this project be accomplished outside of wilderness and still meet it’s objectives?
  - e. Is the project subject to valid existing rights?
  - f. Is there a special provision in the enabling legislation that allows for the proposal?
  - g. How does the proposal benefit wilderness as a whole?
  - h. If this project were not completed, how would the wilderness characteristics of naturalness, solitude, primitive recreation and special features be impacted?
  - i. How would the project ensure that human presence is kept to a minimum?

## ***Appendix G: Explanation of Minimum Requirement and Minimum Tool Analysis***

- j. How would the project ensure that the wilderness provides opportunities for solitude or primitive recreation?
  - k. How did you consider wilderness values over convenience, comfort, political, economic or commercial values while evaluating this project or activity?
2. If after completing step one, the proposal is found to be the minimum required action for administration of the area as wilderness, the wilderness manager needs to complete a minimum tool analysis. The minimum tool analysis is used to determine which method of implementing the proposal would have the least impact on the wilderness resource while still allowing the project to be completed safely and successfully. Generally at least three alternatives are evaluated in the minimum tool analysis; an alternative using non-motorized, non-mechanized equipment, an alternative using motorized and/or mechanized equipment, and one alternative using a combination of the methods. Impacts to naturalness, solitude, primitive recreation and special features are evaluated for each alternative. That method that has the least impact on the wilderness resource and allows the project to be successful is determined to be the minimum tool.

If the analysis shows a justifiable need for motorized equipment, it is important to have this analysis in writing to provide to the official(s) who can authorize the use of mechanical transport or motorized equipment in wilderness. For some units, this analysis may become an integral part of an environmental analysis required to document a decision to use motorized equipment.

Ongoing management practices, especially if they involve mechanical transport, motorized equipment, or structures, should be reviewed to determine if they are still necessary or the best way to complete the task at hand.

The Wilderness Management Plan, to be prepared after the RMP, will contain minimum required and minimum tool analysis for specific management actions dealing with wildlife, grazing operations, fire suppression and other resources in the wilderness areas.